

***Exhibit X***

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

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TRACY CAEKAERT, and  
CAMILLIA MAPLEY,

Case No.  
CV-20-52-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

Defendants,

ARIANE ROWLAND, and  
JAMIE SCHULZE,

DEPOSITION UPON ORAL  
EXAMINATION OF CARLA  
(HAIN) KLESSENS

Plaintiff,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

Case No.  
CV-20-59-BLG-SPW

Defendants.

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BE IT REMEMBERED, that the deposition upon oral examination of CARLA (HAIN) KLESSENS, appearing at the instance of the Plaintiffs, was taken at the offices of Fisher Court Reporting, 2711 1st Avenue North, Billings, Montana, on Thursday, January 11, 2024, beginning at the hour of 9:05 a.m., pursuant to the Federal Rules of Civil Procedure, before Barbara J. McLean, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public.

\* \* \* \* \*

**Carla (Hain) Klessens**

1 Q. And what about, do you know Jamie and  
2 Ariane Rowland?

3 A. I do. We spent time with them too. Their  
4 brother had cancer. He died when he was 16, Jeremy  
5 did. It was -- they were all like family, you  
6 know.

7 My mom taught us kids how to dance, and we  
8 would move furniture in the house, and she just  
9 tried to always have things for us kids to do, keep  
10 us busy. So, I don't know, they were like family.  
11 At least that's the way I saw them.

12 Q. Did you ever hear any accusations of abuse  
13 involving Jamie or Ariane?

14 A. I didn't.

15 Q. Did you ever learn of any sexual abuse  
16 involving Gunnar Hain of children?

17 A. Yes.

18 Q. And how did you come to learn of that?

19 A. Because I was one of them.

20 Q. Do you know when Gunnar Hain started  
21 abusing you?

22 A. Somewhere between the time he and my mom  
23 got married and when I was four, I told my mom. I  
24 was sitting on her lap, learning to tie a bow, and  
25 told her that -- what he was doing. They called

11

**Carla (Hain) Klessens**

1 the Elders. Went from there.

2 Q. Okay. I'm going to kind of just unpack  
3 that in little pieces if that's okay.

4 A. Go ahead.

5 Q. Okay. So you remember telling your mom  
6 that Gunnar Hain was sexually abusing you when you  
7 were about four years old?

8 A. Yeah.

9 Q. That would make that 19 --

10 A. '76.

11 Q. -- '76.

12 A. Yeah.

13 Q. And you said you were learning to tie a  
14 bow. Can you tell me why that sticks out to you?

15 A. Because I was sitting on her lap, and we  
16 were talking, and I told her. Because Gunnar got  
17 upset when I told her, because of course she was  
18 upset, and it was one of those -- there was a good  
19 fight because of it, and he went and stayed with  
20 Martin and Millie Svensen. Mom talked to the  
21 Elders. Gunnar was an Elder at that point the best  
22 that I can remember.

23 They made him be a ministerial servant,  
24 and he stayed gone for a couple weeks, I think.  
25 They told my mom she couldn't divorce him.

**Carla (Hain) Klessens**

1           He swore he wouldn't touch us kids again,  
2           because I didn't know he was touching my sister.  
3           He said he wasn't going to touch us no more. And  
4           in order to get me to be quiet, he started killing  
5           my animals.

6           Q.     Okay. There's a lot in there, and so I'm  
7           going to just keep asking questions if that's okay  
8           and kind of try and unpack all of that.

9           So I heard you say that Gunnar left the  
10          house after you let your mom know that he was  
11          sexually abusing you?

12          A.     Yeah, she wanted him out of the house away  
13          from us girls.

14          Q.     Who all was still living in the house at  
15          that point?

16          A.     All three of us girls were living there  
17          with mom. No, it would have been just me and  
18          Rhonda. Jolene wasn't born yet.

19          Q.     Okay. And my understanding from what  
20          you've just said is that you told your mom, and  
21          your mom either called the Elders or went to the  
22          Elders?

23          A.     Yeah, she called them. They came over to  
24          the house.

25          Q.     Okay.

**Carla (Hain) Klessens**

1           A.     I remember them coming there, because like  
2     I said, Gunnar was not happy. He was very upset  
3     with me.

4           Q.     Do you remember what Elders came to the  
5     house?

6           A.     Martin, Harold Rimby -- I don't remember  
7     who else was there at that time.

8           Q.     Okay. And Martin --

9           A.     Martin and Harold were the ones that my  
10    mom usually called when there were issues or when  
11    there was things going on. That was just who she  
12    went to.

13          Q.     Okay. And is that Martin Svensen?

14          A.     Yeah.

15          Q.     Okay. And I also heard you say that  
16    they -- it sounds like -- did your mom want a  
17    divorce?

18          A.     Yeah, she wanted him gone. They told her  
19    that she couldn't divorce him. Gunnar was blind,  
20    so it was kind of like they played -- you know,  
21    he -- they played on her as far as I'm concerned.  
22    But, yeah, he went and stayed with the Svensens for  
23    a while. Mom didn't talk to him for a couple days.  
24    We still went to meetings and everything, but --

25          Q.     And when you say they told your mom that

14

**Carla (Hain) Klessens**

1 she could not get a divorce from Gunnar, do you  
2 mean the Elders that came to your house?

3 A. Yeah.

4 Q. Do you have an understanding as to why  
5 they wouldn't allow your mother to get a divorce?

6 A. Part of me thinks that they didn't believe  
7 anything was going on. Part of me thinks that they  
8 just wanted to make light of it, like it wasn't a  
9 big deal, like -- like it should have been  
10 something that everybody could get over and brush  
11 it away and it would go away.

12 Q. Do you know if there was any sort of  
13 investigation done? Was there a judicial  
14 committee?

15 A. I know they met with Gunnar a couple  
16 times. He had just became an Elder. They had just  
17 made him an Elder. They made the announcement at  
18 meeting that he was going to be a ministerial  
19 servant again.

20 I know there was a lot -- he would go over  
21 and meet with the Elders whether it was at the  
22 Kingdom Hall or they would go to Martin's. We  
23 weren't there for it, but I know he had a couple  
24 meetings that he had to go to, because even when he  
25 came home, he still had to go, like, do a Bible

15

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1 study with them.

2 Q. So it sounds like Gunnar held some sort of  
3 position, and after you reported to your mother,  
4 who then reported it to the Elders, he was removed  
5 from that position?

6 A. Correct.

7 Q. And they made some sort of announcement  
8 within the congregation?

9 A. Yeah.

10 Q. Do you remember if they specified why he  
11 was being removed?

12 A. I don't.

13 Q. How long did Gunnar stay out of the house  
14 after you told your mother that he was sexually  
15 abusing you?

16 A. Maybe two or three weeks. Probably more  
17 so, because it was an inconvenience for everybody  
18 else to have to take care of him or help him would  
19 be my opinion.

20 Q. I also heard you say that Gunnar killed  
21 some of your animals?

22 A. Oh, yeah.

23 Q. Can you tell me about that?

24 A. My kitten, he killed and put it in my  
25 playhouse. Told me that I didn't need to be



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1 that, I don't -- I don't know. I tried to shut  
2 everything off, so --

3 Q. Do you know if he ever admitted to  
4 sexually abusing you to any other adults in the  
5 Hardin area?

6 A. I have no clue. No clue at all.

7 Q. Do you know if when you were four, so in  
8 1976, when you first reported Gunnar Hain for  
9 sexually abusing you, did any of the Elders in the  
10 Hardin Congregation call the police?

11 A. Not to my knowledge, they didn't.

12 Q. Do you have an understanding why?

13 A. It was -- I don't know. It was -- like I  
14 said, it was like they slapped them on the hands.  
15 And the more I think about it, the more it was kind  
16 of like, don't do it again, kind of like slapping a  
17 kid and telling them to keep their hands out of the  
18 cookie jar.

19 Why they did it that way -- like I said,  
20 they made light of everything like it was an  
21 everyday occurrence and, you know, just don't talk  
22 about it, and it didn't happen then.

23 Q. And later on, in 1990, when you were  
24 disfellowshipped, or around that time that you were  
25 disfellowshipped, and around the time your mother

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1 passed away, when Gunnar Hain came down into your  
2 room and was touching you inappropriately or trying  
3 to feel your baby, did you ever report that to the  
4 Elders of the Hardin Congregation?

5 A. No. Once they had said they were going to  
6 disfellowship me, I had no need to talk to them. I  
7 had no need to let them know anything else that was  
8 going on.

9 Q. So at any point in time do you know if the  
10 Elders of the Hardin Congregation ever called the  
11 police to report Gunnar Hain for child sexual  
12 assault?

13 A. I do not believe so, but I don't know for  
14 sure.

15 Q. Do you know if the Elders of the Hardin  
16 Congregation reported it to anyone?

17 A. I know they were waiting for word back  
18 from New York for discipline. When I was four, I  
19 remember them not knowing how they were going to  
20 take -- or handle it. I know that he had to wait  
21 for a week or whatever for -- that was one of the  
22 things that he was upset about, you know. Because  
23 it hadn't been very long that they had made him an  
24 Elder, and then had to take that away, so -- but I  
25 know -- I know that they did get ahold of New York.

**Carla (Hain) Klessens**

1 Q. And how do you know that?

2 A. Because I remember mom talking about it,  
3 about them waiting to see how they were going to  
4 handle it. I remember Gunnar sitting down and  
5 telling us that this is -- you know, we had to  
6 wait. Because for him to be an Elder, he was -- it  
7 was something that he made a big deal of in the  
8 house, you know, all proud of it and everything.  
9 So when they took it, it was something that he made  
10 a point to let us girls know that, you know, he  
11 wasn't happy, he wasn't -- he worked for a long  
12 time to become an Elder, and that just didn't --  
13 that little bit of talking out of my mouth, that he  
14 lost that. So the guilt that he tried to put, it's  
15 just something that sticks out.

16 Q. Do you remember any circuit overseers  
17 visiting the Hardin Congregation?

18 Hold on. Let me back up.

19 A. Some of them --

20 Q. Do you know what a circuit overseer is?

21 A. Yeah.

22 Q. And what's a circuit overseer?

23 A. They come in and do special talks,  
24 special -- whatever, more sometimes to -- depending  
25 on what's going on in the congregation, to address

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1 Rhonda occurred?

2 A. It would have been right around the time I  
3 was four. She was 11. She would have been nine --  
4 she would have been 11 the last time me and her  
5 were talking. And I think he stopped when she got  
6 her period.

7 Q. Okay. What's the age difference between  
8 you and Tracy?

9 A. Me and Rhonda are five years, so six or  
10 seven years.

11 Q. So you're six or seven years older?

12 A. Younger.

13 Q. Or younger rather. Okay.

14 Same question with Cami.

15 A. Cami would have been five -- five years  
16 older.

17 Q. Okay. And what about Jamie Schulze?

18 A. Me and Jamie were about the same age.

19 Q. And Ariane Rowland?

20 A. Ariane, probably five or six years  
21 younger.

22 Q. When you were four and you told your mom  
23 of what Gunnar did, she confronted Gunnar that  
24 afternoon was your understanding?

25 A. Yeah.

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1 Q. Is that yes?

2 A. Yes.

3 Q. And then I think you testified that he  
4 then moved out of the house for several weeks?

5 A. Yeah, he went and stayed with Martin and  
6 Millie Svensen.

7 Q. I think you also testified that your  
8 mother told the Elders what you had told her. Is  
9 that right?

10 A. Correct.

11 Q. And remind me, who were the Elders that  
12 she told?

13 A. Martin Svensen, Harold Rimby. I want to  
14 say Larry Archer, but I don't know if Larry was an  
15 Elder then. Yeah, I don't know who the others  
16 would have been. But I know Martin. I can see a  
17 face, but I can't think of a name.

18 Q. Were they Elders at the Hardin  
19 Congregation?

20 A. They were Elders at the Hardin  
21 Congregation.

22 Q. When did your mother tell the Elders in  
23 relation to when you told her?

24 A. That day.

25 Q. And how did she tell them?

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1           A.     She called them and told them she needed  
2     to talk to them.

3           Q.     And when she called and said she needed to  
4     talk to them, did she actually talk to somebody?

5           A.     I think they came to the house.

6           Q.     Were you present when she made that phone  
7     call?

8           A.     Yeah.

9           Q.     And do you know who she spoke to?

10          A.     I don't.

11          Q.     And when she made that phone call, do you  
12     recall what she told them?

13          A.     I think she just told them that she needed  
14     to talk to them, and she didn't talk to them over  
15     the phone -- Gunnar may have even made the call and  
16     told them -- they came to the house. I know they  
17     had talked at the house, and then Gunnar went --  
18     and mom went with him to the Kingdom Hall.

19          Q.     And so as we sit here, it sounds like  
20     you're not sure who made the initial phone call to  
21     the Elders --

22          A.     I don't -- I'm -- I would like to think my  
23     mom did, but Gunnar may have, because that was just  
24     his way of trying to handle it.

25          Q.     Okay. And were you present, though, when

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1 house. Like I said, I know they sat at the house  
2 one day and talked, and I know that my mom and  
3 Gunnar left, and they were -- mom said they were  
4 going to the Kingdom Hall; they had to meet with  
5 some of the Elders.

6 Q. And so you remember the Elders coming to  
7 the house at some point?

8 A. Yeah.

9 Q. And when was that in relation to when you  
10 told your mother --

11 A. It would have been the same day.

12 Q. And you have a specific recollection of  
13 the Elders coming to your house.

14 A. Yeah, I remember them coming in and  
15 sitting down.

16 Q. And do you recall who all came in and sat  
17 down?

18 A. I know Martin and Harold were there.

19 Q. Martin Svensen and Harold --

20 A. And Harold Rimby.

21 Q. You were four at the time?

22 A. Yeah.

23 Q. How did you know they were Elders?

24 A. Because -- well, I don't know they were  
25 Elders. I just -- yeah, I know they were Elders.

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1 That's -- I mean, they were the ones that Gunnar  
2 went to. They were the ones my mom went to when  
3 they needed to talk to somebody.

4 My mom had just started going to the  
5 Kingdom Hall, so anything that she had questions  
6 about -- I know Imhoffs up here is who she was  
7 studying with. I know she would call Darrell and  
8 Diane or whatever, but Martin and Harold and --  
9 Harold and June were ones that -- like I said, they  
10 were family. That's who she called when there was  
11 issues.

12 Q. When you told your mom when you were  
13 sitting on her lap, the phone call to the Hardin  
14 Congregation, and the Elders coming to the house,  
15 did that all happen the same day?

16 A. I know the Elders came to the house that  
17 day that I told her. Like I said, Gunnar wasn't in  
18 the house that night. She wanted him out of the  
19 house.

20 Q. And I understand Gunnar left the house  
21 that night, but what I'm trying to figure out is if  
22 you specifically recall the Elders coming to the  
23 house that day.

24 A. Well, they came to the house so mom could  
25 talk to them. I mean, Gunnar needed trying to --



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1 he didn't want to go. I think mom called them.

2 That's just -- she was trying to do things the

3 right way.

4 Q. Okay. And how long were Harold and Martin  
5 at your house that day?

6 A. I couldn't tell you.

7 Q. When they came to the house, did they talk  
8 with both your mother and Gunnar?

9 A. They did.

10 Q. Did they talk to you?

11 A. I don't remember that.

12 Q. You don't remember if they discussed this  
13 with you?

14 A. I don't.

15 Q. Were you present during the entire  
16 conversation?

17 A. Probably not. They probably sent us  
18 outside to play. I couldn't tell you. All I know  
19 is it was a big deal when I told my mom, so...

20 Q. Okay. And when you said they sent you  
21 outside to play, who's "they"?

22 A. My mom, Gunnar.

23 Q. I'm sorry, who got sent out to play?

24 A. Me and Rhonda.

25 Q. Were you present for any part of the

**Carla (Hain) Klessens**

1 conversation between --

2 A. I couldn't tell you.

3 Q. Okay. Do you know how long Harold and  
4 Martin were at the house?

5 A. No. At four, I probably have no sense  
6 of --

7 Q. I have a four-year-old. They have no  
8 sense of time. I understand.

9 A. I know. They sent us to bed, and it was  
10 still light outside, and we were wondering why we  
11 had to be inside and going to bed, so...

12 Q. And that night, Gunnar left the house and  
13 went and stayed where?

14 A. With Martin and Millie.

15 Q. And how long did he stay there?

16 A. I want to say he was there for two or  
17 three weeks.

18 Q. Tell me what happened in those intervening  
19 weeks.

20 A. I don't know. Him and mom talked, and  
21 they went to meetings, or they would meet with the  
22 Elders. Whatever they were doing, studying,  
23 talking, discussing what's supposed -- I don't  
24 know. I know us girls didn't have to go to it, but  
25 I know they met with them several times.